

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP Joseph L. Schwartz (JS-5525) Tara J. Schellhorn (TS-8155) Headquarters Plaza, One Speedwell Avenue Morristown, NJ 07962-1981 Telephone: (973) 583-0800 -and- PACHULSKI STANG ZIEHL & JONES LLP Bradford J. Sandler (NJ Bar No. BS-1367) Shirley S. Cho (admitted <i>pro hac vice</i>) 780 Third Avenue, 34 th Floor New York, NY 10017 <i>Counsel to the Liquidating Trust</i>	
In re: FRANK THEATRES BAYONNE/SOUTH COVE, LLC, <i>et al.</i> , Debtors.	Case No.: 18-34808 Chapter: 11 Hearing Date: July 7, 2020 Hon. Stacey L. Meisel, U.S.B.J.

ADJOURNMENT REQUEST

1. I, Joseph L. Schwartz, Esq.,
- ☒ am the attorney for: the Liquidating Trust
- ☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: Liquidating Trust's First Omnibus Objection to Claims Seeking to Disallow Certain Late-filed Claims (the "First Omnibus Objection") [Doc. No. 848] Solely with Respect to the Claim of Martin Gold [Claim No. 288] (the "Gold Claim").

Liquidating Trust's Fourth Omnibus Objection to Claims Seeking to Disallow and Expunge Certain No Liability Claims (the "Fourth Omnibus")

Objection”) [Doc. No. 927] Solely with Respect to the Claim of Nicholas, Perot, Smith Welch & Smith [Claim No. 236] (the “Nicholas Claim”).

Current Hearing Date: August 4, 2020 at 11:00 a.m.

Objection Deadline: Extended for the Gold Claim to the date that is seven (7) days before the hearing.

New Date Requested: The parties request an approximately 30 day adjournment of the hearing.

Reason for adjournment request:

In connection with the First Omnibus Objection, the only objection received was an informal objection from Martin Gold related to the Gold Claim. As a result of the informal objection, the parties agreed to adjourn the hearing on the First Omnibus Objection solely with respect to the Gold Claim and have been working since that time to reach a resolution. With respect to the Gold Claim, the parties are continuing to work towards a resolution and request a further adjournment.

In connection with the Fourth Omnibus Objection, the only remaining objection is the objection filed to the Nicholas Claim [Docket No. 948]. With respect to the Nicholas Claim, the parties are continuing to work towards a resolution. As a result, the Liquidating Trust request a further adjournment.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

Regarding the Gold Claim, counsel to Martin Gold has consented to the adjournment request.

Regarding the Nicholas Claim, the parties are actively negotiating a resolution of this matter. Counsel to the Liquidating Trust has requested consent from counsel for a further adjournment but did not receive a response prior to submitting this request.

I certify under penalty of perjury that the foregoing is true.

Date: August 3, 2020

/s/ Joseph L. Schwartz

COURT USE ONLY:

The request for adjournment is:

☒ Granted New hearing date: 9/1/2020 at 11:00 am ☐ Peremptory

☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory

☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.

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